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16 UNITED STATES DISTRICT COURT  
17 DISTRICT OF NEVADA, SOUTHERN DIVISION

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19 ASHLEY RICE, individually and as special  
20 administrator of the estate of ROBERT  
WENMAN;

21 Plaintiff,

22 vs.

23 CITY OF NORTH LAS VEGAS; CITY OF  
24 NORTH LAS VEGAS POLICE  
DEPARTMENT; ROBERT JAMESON,  
25 individually; DOES 1-10, inclusive,

26 Defendants.

CASE NO. 2:20-CV-1542-JCM-DJA

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES**

**[SIXTH REQUEST]**

**STIPULATION AND ORDER TO EXTEND DISCOVERY**

**DEADLINES -[SIXTH REQUEST]**

Pursuant to LR 6-1 and LR 26-3, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend discovery in the above-captioned case (60) ~~ninety-one (91) days~~ up to and including ~~Monday, August 22, 2022~~ **October 21, 2022**. In addition, the parties request that the all other future deadlines contemplated by the Discovery Plan and Scheduling Order be extended pursuant to Local Rule. In support of this Stipulation and Request, the parties state as follows:

1. On August 20, 2020 Plaintiff filed her Complaint in the United States District Court.
2. On October 26, 2020, Defendant filed its Answer to the Complaint.
3. Plaintiff served her Initial and Supplemental Document and Witness Disclosures on November 18, 2020.
4. Defendant served its Initial Document and Witness Disclosures on November 18, 2020.
5. On December 23, 2020 Plaintiff served written discovery on Defendants. Defendants' served their responses on April 5, 2021.
6. On January 20, 2021, Robert W. Freeman, Esq. filed his Notice of Association of Counsel.
7. On January 22, 2021 Plaintiffs filed their First Amended Complaint. Defendants filed their Answer on April 19, 2021.
8. On April 5, 2021, Defendants served their First Supplement to Document and Witness Disclosures.
9. On May 10, 2021, Plaintiff served her second set of written discovery on all Defendants. Defendants served responses to written discovery to Defendant Jameson on July 23, 2021. The remaining Defendants' responses are due on August 6, 2021.
10. On May 27, 2021 Defendants' served written discovery on the plaintiff. The

1 responses were served on July 9, 2021.

2 11. On June 2, 2021, Plaintiff served her third set of written discovery on Defendants.  
3 Defendants' responses are due on August 6, 2021.

4 12. On June 25, 2021, Defendants served their Second Supplement to Document and  
5 Witness Disclosures.

6 13. On July 9, 2021 Plaintiffs' served their Third Supplemental Disclosures Pursuant to  
7 FED. R. CIV. P. Rule 26(a)(1)(A).

8 14. On July 23, 2021, Defendant Jameson served his responses to written discovery.

9 15. On August 5, 2021, Defendant Brucken served his responses to written discovery.

10 16. On August 5, 2021, Defendant Skyler Lee served his responses to written  
11 discovery.

12 17. On August 5, 2021, Defendant Jason Lawrence served his responses to written  
13 discovery.

14 18. On August 5, 2021, Defendant Mark Suranowitz served his responses to written  
15 discovery.

16 19. On August 5, 2021, Defendant Ann Taylor served her responses to written  
17 discovery.

18 20. On August 6, 2021, Defendant North Las Vegas Police Department served its  
19 responses to Plaintiff's Second, Third and Fourth Requests for written discovery.  
20 Defendant City of North Las Vegas served its responses on November 29, 2021.

21 21. On August 10, 2021, Defendants served their Third Supplement to Document and  
22 Witness Disclosures.

23 22. On September 10, 2021, Plaintiff served her Fifth request for production of  
24 documents on Defendant City of North Las Vegas. Defendant City of North Las  
25 Vegas served its responses on November 29, 2021.

26 23. On October 25, 2021, all of the Defendants served supplemental responses to  
27 written discovery.

28 24. On October 26, 2021, Plaintiff served her fifth and sixth set of discovery requests.

1           25.     On November 29, 2022, Defendants served their fourth supplement to 26.1  
2           Disclosures.

3           26.     On December 2, 2021, Plaintiff's served her seventh set of discovery requests on  
4           Defendant.

5           27.     On February 18, 2022, Plaintiff took the deposition of Robert Jameson.

6           28.     On April 14, 2022, Plaintiff took the deposition of Ann Taylor.

7           29.     On April 20, 2022, Plaintiff took the deposition of Jason Lawrence.

8           30.     On May 4, 2022, Defendants served their fifth supplement to 26.1 disclosures.

9           31.     On May 27, 2022, Defendant took the deposition of Plaintiff.

10          32.     On June 1, 2022, Defendant took the deposition of Gloria Johnson.

11           **DISCOVERY REMAINING**

12          1.     The deposition of Jim Hudson is scheduled on July 29, 2022.

13          2.     The parties may take the depositions of the designated experts.

14          3.     The parties may take the depositions of any and all other witnesses garnered  
15          through discovery.

16           **WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

17          The parties aver, pursuant to Local Rule 26-3, that good cause exists for the following  
18 requested extension. This Request for an extension of time is not sought for any improper purpose  
19 or other purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing  
20 sufficient time to conduct discovery.

21          The parties seek additional time to complete discovery for several reasons, including but  
22 not limited to the fact that this is a complex matter involving claims of wrongful death, violations  
23 of the fourth and fourteenth amendments, among other claims.

24          Counsel for Defendant is currently preparing for trial in *Clark, Christopher v. State Farm*  
25 *Mutual Automobile Insurance Company*, Eighth Judicial District Court Case No. A-19-804435-C.  
26 The trial is expected to last two weeks. In addition, the parties have scheduled the deposition of  
27 Detective Jim Hudson twice, however, due to counsel's respective illness this deposition has not  
28 gone forward. The deposition is now scheduled to go forward on July 29, 2022.

1 The reasons for this request are not for an improper purpose or for the purpose of delay.

2 Extension or Modification of The Discovery Plan and Scheduling Order. LR 26-3 governs  
3 modifications or extension of the Discovery Plan and Scheduling Order. Any stipulation or  
4 motion to extend or modify that Discovery Plan and Scheduling Order must be made no later than  
5 twenty-one (21) days before the expiration of the subject deadline and must comply fully with LR  
6 26-3.

7 This is the sixth request for extension of time in this matter. The parties respectfully  
8 submit that the reasons set forth above constitute compelling reasons for the short extension.

9 The following is a list of the current discovery deadlines and the parties' proposed  
10 extended deadlines:

11 Scheduled Event	Current Deadline	Proposed Deadline
12 Discovery Cut-off	<i>Monday, August 22, 2022</i>	<i>Friday, October 21, 2022</i>
13 Deadline to Amend Pleadings or Add Parties	<i>Closed</i>	<i>Closed</i>
14 Expert Disclosure pursuant to FRCP26 (a)(2)	<i>Thursday, June 23, 2022</i>	<i>Thursday, June 23, 2022</i>
15 Rebuttal Expert Disclosure pursuant to FRCP. 26(a)(2)	<i>Friday, July 22, 2022</i>	<i>Friday, July 22, 2022</i>
16 Dispositive Motions	<i>Wednesday, September 21, 2022</i>	<i>Monday, November 21, 2022</i>
17 Joint Pretrial Order	<i>Friday, October 21, 2022</i>	<i>Tuesday, December 20, 2022</i>

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